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Sharp Electronics Manufacturing Company of America, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT) ANTITRUST  
LITIGATION

Case No. 07-cv-5944 (SC)

MDL No. 1917

This Document Relates to:

*Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.*,  
No. 13-cv-1173;

*Electrograph Systems, Inc. et al. v. Technicolor SA,*  
*et al.*, No. 13-cv-05724;

*Siegel v. Technicolor SA, et al.*, No. 13-cv-05261;

*Best Buy Co., Inc., et al. v. Technicolor SA, et al.*,  
No. 13-cv-05264;

*Target Corp. v. Technicolor SA, et al.*, No. 13-cv-  
05686;

*Interbond Corporation of America v. Technicolor*  
*SA, et al.*, No. 13-cv-05727;

**DECLARATION OF CRAIG A.  
BENSON IN SUPPORT OF DIRECT  
ACTION PLAINTIFFS' REPLY TO  
THEIR MOTION TO ENFORCE  
THE COURT'S ORDER RE:  
THOMSON DISCOVERY BY  
IMPOSING DEADLINE ON  
THOMSON SA'S PRODUCTION OF  
DOCUMENTS**

DATE: December 12, 2014

TIME: 10:00 a.m.

PLACE: Courtroom 1, 17th Floor

JUDGE: Hon. Samuel Conti

1 *Office Depot, Inc. v. Technicolor SA, et al.*, No. 13-  
cv-05726;

2 *Costco Wholesale Corporation v. Technicolor SA,*  
3 *et al.*, No. 13-cv-05723;

4 *P.C. Richard & Son Long Island Corporation, et al.*  
*v. Technicolor SA, et al.*, No. 13-cv-05725;

5 *Schultze Agency Services, LLC v. Technicolor SA,*  
6 *Ltd., et al.*, No. 13-cv-05668;

7 *Sears, Roebuck and Co. and Kmart Corp. v.*  
*Technicolor SA*, No. 3:13-cv-05262;

8 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.*, No.  
9 13-cv-00157;

10 *Crago, et al. v. Mitsubishi Electric Corp.*, No. 14-cv-  
02058.

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13 I, CRAIG A. BENSON, hereby declare as follows:

14           1.       I am a partner with the law firm of Paul, Weiss, Rifkind, Wharton &  
15 Garrison LLP, counsel for Plaintiffs Sharp Electronics Corporation (“SEC”) and Sharp  
16 Electronics Manufacturing Company of America, Inc. (“SEMA”). I am an active member in  
17 good standing of the bars of the State of Maryland, the State of New York, and the District of  
18 Columbia, and on March 20, 2013 was granted leave to appear *pro hac vice* in this litigation. I  
19 have personal knowledge of the facts stated herein and could competently testify to these facts if  
20 called upon to do so. I submit this Declaration in support of Direct Action Plaintiffs’ Reply  
21 Memorandum in Support of their Motion to Enforce the Court’s Order re: Thomson Discovery  
22 by Imposing Deadline on Thomson SA’s Production of Documents.

23           2.       Attached hereto as Exhibit A is a true and correct copy of Direct Action  
24 Plaintiffs’ First Set of Requests for Production to Thomson SA (April 14, 2014).

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed  
2 this 17th day of November, 2014, at Washington, DC.

3 /s/ Craig A. Benson

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